

BY: Howard B. Segal, Esquire
IDENTIFICATION NO: 33168
100 North 17th Street, 9th Floor
Philadelphia, PA 19103
(215) 592-7520

ATTORNEY FOR PLAINTIFFS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ROBERT ARGENTINA and	:	
MARIE ARGENTINA, h/w,	:	
	:	
Plaintiffs,	:	CIVIL ACTION
	:	
vs.	:	NO.: 02-CV-3192
	:	
MYCONE DENTAL SUPPLY	:	
COMPANY, INCORPORATED t/a	:	
NATIONAL KEYSTONE INDUSTRIES,	:	
and	:	
WILLIAM DIXON COMPANY	:	
division of GROBERT USA,	:	
	:	
Defendants.	:	
	:	

JOINT MOTION FOR CONTINUANCE BY ALL PARTIES

The parties hereto respectfully request that this Honorable Court adjourn the Arbitration currently scheduled for February 20, 2003, and reschedule that arbitration to a day a least ninety (90) days from the date of this Motion. In support thereof, the parties avers as follows:

1. This is a products liability matter.
2. Since this action began, the parties have been conducting discovery in good faith.

To date, five depositions in this matter have been taken.

3. During the course of discovery in this matter, there are documents to be supplied by the Defendant Mycone that are still outstanding. These documents are voluminous and have to be retrieved from an off-site, long term storage facility, and Defendant Mycone is in the process of gathering and supplying same.

4. It is anticipated that after receiving these documents the corporate designee for Mycone will have to be deposed concerning said documents and it is possible that other persons from the Defendant Mycone will also have to be deposed concerning same.

5. In addition, counsel for Defendant Grobet is in the process of inquiring of its client to determine the proper corporate designee to be deposed concerning this matter.

6. Defendant Mycone is endeavoring to get current addresses of potential witnesses and will then be deposing or subpoenaing records from them.

7. Expert witnesses will need time after the foregoing discovery has been completed to complete their analysis.

8. All parties desire to complete full discovery in this matter, therefore, all parties respectfully request that the arbitration scheduled for February 20, 2003, be adjourned and rescheduled to a date at least ninety (90) days from the date of this Motion.

HOWARD B. SEGAL, ESQUIRE
Attorney for Plaintiffs
Robert Argentina and Marie Argentina

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NATIONAL KEYSTONE INDUSTRIES,	:	
and	:	
WILLIAM DIXON COMPANY	:	
division of GROBERT USA,	:	
	:	
Defendants.	:	
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CERTIFICATION

I, Howard B. Segal, Esquire, hereby certify that he is authorized to file the above Joint Motion for Continuance of All Parties and that he has forwarded a copy of this Motion to counsel for the Defendants and they have agreed and consented to same.

HOWARD B. SEGAL, ESQUIRE
Attorney for Plaintiffs
Robert Argentina and
Marie Argentina

ATTORNEY FOR PLAINTIFFS

**ROBERT ARGENTINA and
MARIE ARGENTINA, h/w,**

Plaintiffs,

VS.

**MYCONE DENTAL SUPPLY
COMPANY, INCORPORATED t/a
NATIONAL KEYSTONE INDUSTRIES,
and
WILLIAM DIXON COMPANY
division of GROBERT USA,**

Defendants.

CIVIL ACTION

NO.: 02-CV-3192

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I, Howard B. Segal, Esquire, attorney for Plaintiffs, Robert and Marie Argentina, hereby certify that I caused a true and correct copy of the foregoing Joint Motion for Continuance to be served on January 16, 2003 , via-U.S. mail, postage prepaid, to the following:

Michael J. Plevyak, Esquire
WHITE & WILLIAMS, LLP
1500 Lancaster Avenue
Paoli, PA 19301

John T. Donovan, Esquire
RAWLE & HENDERSON, LLP
The Widener Building
One South Penn Square
Phila., PA 19107

HOWARD B. SEGAL, ESQUIRE
Attorney for Plaintiffs,
Robert Argentina and
Marie Argentina

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WILLIAM DIXON COMPANY	:	
division of GROBERT USA,	:	
	:	
Defendants.	:	
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ORDER

AND NOW, this _____ day of January, 2003, upon consideration of the parties Joint Motion for a Continuance, it is hereby ORDERED and AGREED that said Motion is Granted and that the Arbitration in the above-captioned which is currently scheduled for February 20, 2003, is adjourned and shall be rescheduled to a date not less than 90 days from the date of this Order.

Approved:

J.